

Ross C. Goodman, Esq.  
Nevada Bar No. 7722  
GOODMAN LAW GROUP, P.C.  
520 S. Fourth Street, Second Floor  
Las Vegas, Nevada 89101  
Telephone: (702) 383-5088  
Facsimile: (702) 385-5088  
Email: [ross@goodmanlawgroup.com](mailto:ross@goodmanlawgroup.com)

Richard Bruce Herman (admitted *pro hac vice*)  
The Helmsley Building,  
230 Park Avenue, Suite 300  
New York, New York 10169  
Telephone: (917) 749-8888  
Email: [rbh@richardbherman.com](mailto:rbh@richardbherman.com)  
*Attorneys or Alan Shinderman*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

MARKMAN BIOLOGICS CORP. and ALAN  
SHINDERMAN,

Defendant.

and

ASPEN ASSET MANAGEMENT  
SERVICES, LLC,

Relief Defendant.

Case No.: 2:23-cv-00288-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
MOTIONS TO COMPEL**

**(Second Request)**

Defendant Alan Shinderman (“Mr. Shinderman”), by and through their undersigned counsel of record, and Plaintiff, Securities and Exchange Commission (“Plaintiff”), by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. There are ongoing discovery disputes in this case as reflected by the SEC’s motion to compel (ECF No. 65), motion for leave to take a second deposition from Mr.

1 Shinderman (ECF No. 71), and motion to extend the time frame for discovery (ECF No. 72).

2 2. On September 13, 2024, the Court granted motions by Marquis Aurbach Chtd.  
3 and Lucosky Brookman LLP to withdraw their representation of Defendants (ECF Nos. 61  
4 and 62); granted motions by Marquis Aurbach and Lucosky Brookman LLP motion to extend  
5 time (ECF No. 73) and motion to shorten time (ECF No. 74). ECF No. 76. The Court further  
6 ordered Defendants to respond to SEC's recent discovery motions (ECF Nos. 65, 71, and 72)  
7 by November 11, 2024.  
8

9 3. On September 18, 2024, Attorney Ross C. Goodman entered an appearance in  
10 this matter on behalf of Mr. Shinderman (ECF No. 77) and Attorney Richard Bruce Herman's  
11 verified petition (ECF No. 78) for permission to practice pro vice in this matter on behalf of  
12 Mr. Shinderman was approved on September 19, 2024, the Court granted. ECF No. 79.  
13

14 4. The Parties met for a conference on November 5, 2024 to discuss additional time  
15 familiarize with the details on this case, review additional discovery, and discuss settlement.

16 5. This Court granted [85] the Stipulation for Extension of Time [84] re [65] Motion,  
17 [71] Motion, and [72] Motion making Responses due by December 11, 2024.

18 6. The Parties agreed on November 25, 2024 to a second 30-day extension for  
19 Defendants to file a response to Plaintiff's Motion from December 11, 2024, to January 10,  
20 2025.  
21

22 7. As part of this extension, the parties request to continue the dispositive motion  
23 deadline to sixty (60) days from the conclusion of fact discovery (if the Court grants one or more  
24

25 ///

26 ///

27 ///

28 ///

1 of the SEC's pending motions (ECF Nos. 65, 71 and 72) or sixty (60) days from when the Court  
2 denies the SEC's motions to compel (ECF Nos. 65, 71 and 72).

3  
4 STIPULATED AND AGREED TO: this 10<sup>th</sup> day of December 2024.

5  
6 /s/ Edward J. Reilly, Esq.

7 By \_\_\_\_\_  
8 Edward J. Reilly Esq.  
9 Derek Bentsen, Esq.  
10 Ada Fernandez Johnson, Esq.  
11 Katherine H. Stella, Esq.  
12 100 F Street, NE  
13 Washington, DC 20549  
14 *Attorneys for Plaintiff Securities*  
15 *and Exchange Commission*


/s/ Ross C. Goodman, Esq.

By: \_\_\_\_\_  
Ross C. Goodman, Esq.  
Goodman Law Group, P.C.  
520 S. 4<sup>th</sup> Street, 2<sup>nd</sup> Fl.  
Las Vegas, NV 89101  
*Attorneys for Defendant, Alan*  
*Shinderman*

12  
13 /s/ Richard B. Herman, Esq.

14 By \_\_\_\_\_  
15 Richard B Herman. Esq.  
16 The Helmsley Building  
17 230 Park Avenue, Suite 300  
18 New York, NY 10169  
19 *Attorneys for Defendant Alan*  
20 *Shinderman*

21 IT IS SO ORDERED.

22 

23 DANIEL J. ALBREGTS  
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: 12/11/2024  
26  
27  
28